Alex Bouthilet SBOT # 24080800 The Wright Firm, L.L.P. 8150 N. Central Expressway Suite 775 Dallas, Texas 75206 469.635.6900 Phone 214.780.9797 Fax

ATTORNEY FOR DEBTORS

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE:

\$ CASE NO. 20-40442

\$ ROHRER, NORVEL GLEN

EVA GOMEZ ROHRER

\$ CHAPTER 7

MOTION TO EXTEND TIME TO FILE REAFFIRMATION AGREEMENT WITH SANTANDER CONSUMER USA

TO THE HONORABLE U.S. BANKRUPTCY JUDGE OF SAID COURT:

COME NOW, Norvel Glen Rohrer and Eva Gomez Rohrer, (the "Debtors"), who request an order extending the deadline to file their reaffirmation agreement with Santander Consumer USA, and would respectfully show the Court as follows:

- This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28
 U.S.C. §1334.
 - 2. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
 - 3. Debtors filed a petition under Chapter 7 of the Bankruptcy Code on 2/12/2020.
- 4. Debtors' reaffirmation agreements were due on 05/12/2020, however, due to Covid-19, Debtors' Meeting of Creditors was continued and held on 5/22/2020. The 60th day from the 341 Meeting of Creditors is 7/21/2020.

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- 5. Debtors need additional time to allow time to obtain a reaffirmation agreement from creditor.
- 6. Debtors request an additional thirty days, until 08/20/2020, in order to file the reaffirmation agreement with the Court.
- 7. Debtors are not making this request to hinder or delay their creditors or any other party in interest.

WHEREFORE, PREMISES CONSIDERED, Debtors pray for an order of this Court extending the deadline to file the reaffirmation agreement with Santander Consumer USA to 08/20/2020, and for such other and further relief to which they may be entitled.

Respectfully submitted,

/s/ Alex Bouthilet
Alex Bouthilet
SBOT # 24080800
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 2, 2020 a true and correct copy of the foregoing was served on all parties in interest below by first class mail or electronic notice.

DEBTOR:

Norvel & Eva Roher 7271 Donald Road Krum, Texas 76249

CHAPTER 7 TRUSTEE:

Linda S Payne Chapter 7 Bankruptcy Trustee 12770 Coit Road, Suite 541

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Dallas, TX 75251-1366

UNITED STATES TRUSTEE:

U.S. Trustee 1100 Commerce Street Room 976 Dallas, TX 75242

PARTIES REQUESTING NOTICE:

None.

By: <u>/s/ Alex Bouthilet</u> Alex Bouthilet